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April 6, 2020

Via Electronic Filing

The Honorable Senior Judge Frederic Block
U.S. District Court Eastern District of New York
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Singh v. Lintech Electric, Inc. et al*
Case No.: 1:18-cv-05780-FB-SMGJO

Dear Honorable Senior Judge Block:

This law firm represents Defendants Lintech Electric, Inc. and Linden Tudor in the above-referenced action.

This law firm also represents Defendants Holly Tudor, Linden Tudor and Tudor Enterprise Family Limited Partnership in the state court actions captioned *Singh v. Holly Tudor et al* (Index No. 720551-2019) (the “**First State Court Action**”) and *Singh v. Tudor Entr. Family Ltd Partnership et al* (Index No.: 526826-2019) (the “**Second State Court Action**”, and together, the “**State Court Actions**”).

Pursuant to Your Honor’s Individual Motion Practice Rules 1(D) and 2(D), this letter respectfully serves to request a global two (2) week extension of the parties’ previously agreed upon briefing schedule for Defendants’ motion to dismiss the State Court Actions. The revised proposed briefing schedule is as follows:

1. Defendant’s Motion to Dismiss to be filed on or before: April 24, 2020;
2. Plaintiff’s Opposition to be filed on or before May 15, 2020;
3. Defendant’s Reply to be filed on or before May 29, 2020

This is the second request of its nature. The basis of this request is that the undersigned law firm is observing the Jewish high holiday of Passover, which falls this week.

A second, independent basis also necessitates an extension of the briefing schedule.

Defendants Lintech Electric, Inc. and Linden Tudor have recently submitted a proposed protective order before The Honorable Magistrate Judge Gold. [See Dckt. No. 56]. The proposed protective order covers certain confidential financial records related to Plaintiff’s wage-and-hour allegations in the Federal Action. A protective order is necessary to ensure that any financial records disclosed as part of the wage-and-hour action are not used in any manner in the State Court Actions.

This afternoon, via email at 1:18 p.m., Plaintiff's counsel demanded that the confidential financial records be disclosed without a protective order, and that he be afforded the opportunity to review them before briefing opposition to the motion to dismiss the State Court Actions.

Plaintiff's counsel tacitly admits that he does not have any good faith basis for filing the State Court Actions, which contain no substantive factual allegations, and were pled entirely "upon information and belief". [See Dckt. No. 48].

As such, Plaintiff's counsel has not consented to the instant application.

This request would not affect any other scheduled deadlines.

We wish Your Honor and the Court the best during these extraordinary times.

Thank you, in advance, for your time and consideration.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

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VIA ECF: All Counsel